

The Costs of Uncertainty

The past year has seen on-going discussions over the review of the RoHS and WEEE Directives. The revision process in progress is known as "re-casting" and requires agreement between the European Commission (the appointed executive body), the Environment Committee of the European Parliament (drawn from elected political members) and the European Council of Ministers (representatives from the national government of each member state).

At the beginning of the year, the timeline for the process was indicating a first reading of agreed revised texts in the full Parliament at the end of April 2010. However, the tri-partite discussions and negotiations have continued without agreement and the date of this first reading has continued to move out. At the time of writing, the latest compromise texts for both recasts were due to be discussed in Parliament on November 22nd and if approved would then need to be ratified by the Council on December 20th.

However, it is by no means certain that the discussions on either Directive will be complete in time, especially as it has been reported that agreement on the final changes to the WEEE Directive is still some way off. Given that the two Directives started off as a single

text and still have considerable interdependence, it would seem odd that RoHS could be approved in a revised form without WEEE also progressing. However, currently the scope of RoHS is determined by the WEEE Directive and the likely change to make the RoHS Directive have its own "open" scope (whereby all products are considered to be affected, unless explicitly excluded) would break the main bond between them. It is possible then that the RoHS Directive's recast could proceed in advance of the changes to the WEEE Directive, but we are still likely to need to wait until 2011 for the clarity we need.

The proposals for new and altered laws always educe many questions and uncertainties for business. Whilst there will usually be additional costs involved for industry from the impact of the final changes when they are known, there are also significant costs associated with these uncertainties as the changes progress. Businesses will have to make some preparations to react to changes at the proposal stage assuming they will or will not have the feared impact, such as perhaps the removal of an exemption from a current product. The IABM tries to provide the latest updates on global regulations and thus to keep these uncertainty costs to a minimum.

RoHS = Restriction of Hazardous Substances

WEEE = Waste Electrical and Electronic Equipment

As well as our monthly Technical Bulletin which provides a round-up of the latest regulatory committees, we also publish individual meeting reports and useful resources to help members navigate their way through the necessary legislation including coverage of ABU, AES, EBU, EMC, IEC, ISO and SMPTE as well as RoHS, WEEE and REACH legislation.

If you have any queries on any of the regulatory or environmental standards mentioned on these pages, please contact ttg@theiabm.org and one of our technical consultants will help you further. Paul Treleaven is your contact for standards and Nigel Burt is the contact for environmental topics.

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